

JAMES A. HUGHES (SBN 88380)
SULLWOLD & HUGHES
235 Montgomery Street, Suite 730
San Francisco, CA 94104
Telephone: (415) 263-1850
Facsimile: (415) 989-9798

Attorneys for Defendants
INTEGRITY DATA APPLICATIONS CONSULTING, LLC,
and JONATHAN BALZORA

SEDGWICK, DETERT, MORAN & ARNOLD LLP
CHRISTOPHER J. KELLER (Bar No. 178491)
One Market Plaza
Steuart Tower, 8th Floor
San Francisco, CA 94105
Telephone: (415) 781-7900
Facsimile: (415) 781-2635

Attorneys for Plaintiff and Counterdefendant
iSMART INTERNATIONAL LIMITED and
Counterdefendant RAJ DHESIKAN

PAUL HASTINGS JANOFISKY & WALKER LLP
MICHAEL N. EDELMAN (Bar No. 180948)
Five Palo Alto Square, Sixth Floor
Palo Alto, CA 94306-2155
Telephone: (650) 320-1800
Facsimile: (650) 320-1900

Attorneys for Defendants and Counterclaimants
I-DOCSECURE, LLC; E-NETSECURE SERVICES, INC.,
ISMART SECURE LLC and JOSEPH BAGGIO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

E-FILED - 8/2/06

ISMART INTERNATIONAL LIMITED, an India
Corporation,

Plaintiff,

vs.

I-DOCSECURE, LLC, a California Limited
Liability Company; E-NETSECURE SERVICES,
INC., a California Corporation; INTEGRITY
DATA APPLICATIONS CONSULTING, LLC, a
California Limited Liability Company; JOSEPH
BAGGIO, an individual; and JONATHAN
BALZORA, an individual,

Defendants.

Case No.: C 04-03114 RMW

**STIPULATION AND ORDER
RE EXPERT AND NON-EXPERT
DISCOVERY**

AND RELATED COUNTER CLAIM

1 IT IS HEREBY STIPULATED, by and between the parties hereto through their
2 respective undersigned counsel:

3 WHEREAS, the parties previously agreed that fact depositions in this case would occur
4 in August or September, assuming Plaintiff's Motion to Disqualify Paul, Hastings, Janofsky & Walker
5 ("Motion to Disqualify") is denied;

6 WHEREAS, pursuant to the Court's June 13, 2006 Order, the deadline for initial expert
7 disclosures is July 17, 2006; the deadline for rebuttal expert disclosures is August 7, 2006; and the
8 deadline for completion of expert discovery is August 25, 2006;

9 WHEREAS, the parties wish to conduct fact depositions before submitting expert
10 disclosures and conducting fact discovery;

11 WHEREAS, absent modification of the deadlines in the Court's June 13, 2006 Order,
12 the parties would be conducting expert disclosure and discovery before fact depositions had been
13 taken;

14 WHEREAS, various written discovery has been propounded by both parties and
15 responses are due on various dates in July;

16 WHEREAS, the parties have noticed or subpoenaed depositions for various dates
17 throughout July, or otherwise indicated that they wish to notice additional depositions for July;

18 WHEREAS, the parties agree that the aforementioned factors provide good cause for
19 modification of certain deadlines set by the Case Management Conference Order;

20 NOW, THEREFORE THE PARTIES THROUGH THEIR COUNSEL HEREBY
21 STIPULATE AND AGREE that, subject to approval of the Court, an Order should issue continuing
22 the dates in the June 13, 2006 Order as follows:

- 23 1. The deadline for expert witness disclosures shall be August 18, 2006;
- 24 2. The deadline for rebuttal expert disclosures shall be September 8, 2006;
- 25 3. The deadline to complete expert witness discovery shall be September 22, 2006;
- 26 4. The deadline to file dispositive motions shall be September 22, 2006.

1 4. Plaintiff shall have until August 4, 2006 to answer the outstanding discovery
2 requests;

3 5. The Defendants shall have until August 8, 2006 to answer the outstanding discovery
4 requests;

5 6. The parties will meet and confer to determine mutually convenient dates for non-
6 expert depositions and will use their best efforts to schedule non-expert depositions before the relevant
7 expert disclosures are due.

8 7. The parties are agreeing to these dates on the assumption that the Motion to Disqualify is
9 denied.

10 IT IS SO STIPULATED.

11 DATED: July 14, 2006

SULLWOLD & HUGHES

13 _____
14 /s/
15 JAMES A. HUGHES

16 Attorneys for Defendants INTEGRITY DATA
17 APPLICATIONS CONSULTING, LLC and
18 JONATHAN BALZORA

17 DATED: July 14, 2006

SEDGWICK, DETERT, MORAN & ARNOLD LLP

19 By: _____
20 /s/
21 CHRISTOPHER J. KELLER

22 Attorneys for Plaintiff and Counter-defendant ISMART
23 INTERNATIONAL LIMITED and Counter-defendant
24 RAJ DHESIKAN

23 DATED: July 14, 2006

PAUL, HASTING, JANOFSKY & WALKER, LLP

25 By: _____
26 /s/
27 MICHAEL EDELMAN

28 Defendants and Counterclaimants I-DOCSECURE, LLC,
E-NETSECURE SERVICES, INC., ISMART SECURE
LLC and JOSEPH BAGGIO

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2
3 Dated: 8/2, 2006 /S/ RONALD M. WHYTE

4 Hon. Ronald M. Whyte
5 United States District Judge
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28